



## ST. CROIX RENAISSANCE

October 16, 2006

Carl-Axel P. Soderberg, P.E.  
Director  
Caribbean Environmental Protection Division  
U.S. Environmental Protection Agency - Region 2  
1492 Ponce De Leon Avenue, Stop 22  
Centro Europa Building - Suite 417  
San Juan, PR 00907-4127

Re: St. Croix Renaissance Park  
EPA ID # VID090302084  
Reference No. CEPD-RCRA-06-3007-3008-018

Dear Mr. Soderberg:

I am in receipt of EPA Notice of Violation - RCRA § 3007 - Information Request, which you issued for the St. Croix Renaissance Park facility on September 29, 2006. St. Croix Renaissance Group, LLLP, hereinafter "SCRG", the owner, received the Notice of Violation on October 11, 2006. In accordance with your directive concerning requests for additional time, SCRG requests an extension of ninety (90) days to respond to EPA's Information Request.

SCRG is already working to address EPA's concerns; however, we require additional time to ensure an accurate, thorough and comprehensive response. The following are specific reasons we are requesting a 90-day extension:

1. SCRG has a limited number of employees who are available to review and assess the significant amount of information necessary to fully respond to the Notice of Violation. SCRG is therefore soliciting the services of a contractor to help us prepare a complete and accurate response to your inquiry. Given the timeline in question, we also believe that SCRG will benefit from the counsel of a third party expert in addressing several of the violations cited by EPA that are historical in nature. We have already started this process, but the procurement requires additional time.
2. SCRG will need to work with the contractor to review numerous historical documents and records dating back to June 2002, and to examine the alumina-manufacturing units and process conducted by the former owner of this facility.

ST. CROIX RENAISSANCE GROUP, LLLP

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